UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOSE MARIA DECASTRO, a/k/a CHILLE DECASTRO, a/k/a DELETE LAWZ,

Plaintiff,

v.

CASE NO. 1:22-cv-11421-ADB

JOSHUA ABRAMS a/k/a ACCOUNTABILITY FOR ALL, KATE PETER a/k/a MASSHOLE TROLL MAFIA,

Defendants.

DEFENDANT KATE PETER'S EMERGENCY MOTION FOR A STATUS CONFERENCE

Defendant Kate Peter ("Ms. Peter") hereby requests, on an emergency basis, that this Court schedule a Status Conference on October 18, 2022 or as soon as thereafter practicable in order to address the threatening and harassing behavior of Plaintiff Jose Maria DeCastro ("Mr. DeCastro") towards Ms. Peter and undersigned counsel. Mr. DeCastro has sent Ms. Peter and undersigned counsel menacing emails and voicemails (and publicized them on YouTube), and repeatedly made clear to Ms. Peter that the goal of this litigation to try to intimidate and harass her. Undersigned counsel further understands that Mr. DeCastro has threatened others, including by saying he will "dox"—identify the identify, address, and other personal information of a person on the internet—and send his supporters after then, unless those third-parties provide affidavits in support of his claims.

As Mr. DeCastro put it in response to counsel's request that Mr. DeCastro please

communicate with counsel rather than directing anger towards Mr. Peter, Mr. DeCastro wrote, among other things, "Kate – I 'm never going to stop until you're done. I will never ever ever ever ever stop [.] And its' not just me." A true and correct copy of this chain of email correspondence is attached hereto as Exhibit A, together with other emails from Mr. DeCastro. The very day that undersigned counsel filed his Notice of Appearance, Mr. DeCastro left undersigned counsel a voicemail, a transcript of which is attached hereto as Exhibit B. Mr. DeCastro concluded his email by saying:

You're not my daddy. I have no obligation to you, none, you you. I don't owe you a goddamn thing.

You're a bloodsucking law lawyer who doesn't give a shit about justice. You're doing court law cases. You don't give a shit about justice or the rule of law or the Constitution or America . . .

There is no question that Mr. DeCastro is using this litigation to drain Ms. Peter financially. As Mr. DeCastro put it himself:

I don't care if I win... I care that you have to hire a lawyer... I care that I extend the process for as long as I can to drain you.

Now for the last time you stupid retarded fuck— i'm not interested in any relationship with you and I've continually told you this. I don't care that you're a loser and you have nothing going on with your life you have no motivation... I don't care.

FaceBook message from Mr. DeCastro to Ms. Peter, a true and correct copy of which is attached here as Exhibit C.

WHEREFORE, Ms. Peter respectfully requests that this Court set an emergency status to ensure that Mr. DeCastro cease his harassment of Ms. Peter, her counsel, and others. Indeed, default of Mr. DeCastro's lawsuit is warranted and necessary where he is seeking to leverage this

¹ A recording of this voicemail was posted on YouTube. See https://youtu.be/JGHQxj3VM18.

process to attack, threaten, and drain Ms. Peter of her financial resources.

Respectfully submitted,

KATE PETER,

By her attorney,

Benjamin J. Wish (BBO # 672743)

TODD & WELD LLP

One Federal Street, 27th Floor

Boston, MA 02110 Tel. (617) 720-2626

bwish@toddweld.com

CERTIFICATE OF SERVICE

I, Benjamin J. Wish hereby certify that on October 18, 2022, I caused the foregoing document to be served via email upon the following *pro se* litigant and have further mailed him a copy via the U.S. postal service:

Jose Maria DeCastro (*Pro Se*) 1258 Franklin Street Santa Monica, CA 90404 iamalaskan@gmail.com

/s/ Benjamin J. Wish

Benjamin J. Wish